

Exhibit 3

Cable Systems—Arizona

TV Market Ranking: Outside TV Markets
Franchise award date: July 27, 1989
Franchise expiration date: N.A. Began: January 1, 1991.

Channel capacity: 40 (not 2-way capable)
Channels available but not in use: 15

Basic Service

Subscribers: 125 (06/18/92)
Programming (received off-air): KVVU-TV (F) Las Vegas; KAET (P), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I) Phoenix.
Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; CNN; Country Music TV; Discovery Channel; ESPN; Family Channel; Headline News; Home Shopping Network; MTV; Nashville Network; Nickelodeon; Trinity Bcstg. Network; USA Network; VH1.
Fee: \$15.00 installation; \$17.00 monthly; \$15.00 additional installation.

Pay Service 1

Pay Units: N.A.
Programming (via satellite): Disney Channel; Encore; The Movie Channel.
Fee: \$7.00 monthly (Encore), \$8.00 monthly (Disney), \$10.00 monthly (TMC).
Miles of plant: 7.0 (coaxial). Homes passed: 335.
Manager: James Monroe.
Franchise fee: 3% of gross.
Ownership: Phoenix Cable Inc. (MSO). Purchased from Westcom Cablevision Inc.
Note: Current information not available.

PEORIA—See PHOENIX, AZ.

PERIDOT—See SAN CARLOS, AZ.

PERRYVILLE—Phoenix Cable Inc., 10 S. Franklin Turnpike, Ramsey, NJ 07446. Phone: 201-825-9090. Fax: 602-483-1338. County: Maricopa. ICA: AZ0078.

TV Market Ranking: Outside TV Markets.
Franchise award date: March 23, 1990.
Franchise expiration date: March 23, 2005.
Began: January 1, 1991.
Channel capacity: 60. Channels available but not in use: N.A.

Basic Service

Subscribers: 163 (05/31/96).
Programming (received off-air): KAET (P), KNXV-TV (A), KPAZ-TV (T), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I), KTVW-TV (S), KUTP (U) Phoenix.
Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; CNN; Country Music TV; Discovery Channel; ESPN; Family Channel; Headline News; Home Shopping Network; MOR Music; MTV; Nashville Network; Nickelodeon; TV Guide Channel; Turner Network TV; USA Network; VH1.
Fee: \$25.00 installation; \$17.00 monthly; \$15.00 additional installation.

Pay Service 1

Pay Units: N.A.
Programming (via satellite): Disney Channel; Encore; HBO; Showtime; The Movie Channel.
Fee: \$7.00 monthly (Encore), \$8.00 monthly (Disney), \$10.00 monthly (Showtime or TMC), \$11.00 monthly (HBO).
Homes passed: 200. Total homes in franchised area: 1,000.
Manager: James Monroe.
Franchise fee: 5% of gross.
Ownership: Phoenix Cable Inc. (MSO).

PHOENIX—Cox Cable, 17602 N. Black Canyon Hwy., Phoenix, AZ 85023-2304. Phone: 602-866-0072. Fax: 602-863-3532. County: Maricopa. Also serves Ahwatukee, Apache Country Club, Apache Wells, Buckeye, Chandler, East Mesa, Fountain Hills, Glendale, Golden Hills, Goodyear, Guadalupe, Leisure World, Litchfield Park, Maricopa County (portions),

Mesa, Paradise Valley, Peoria, Sun City, Sun City West, Sun Lakes, Surprise, Tempe, Youngtown. ICA: AZ0001.

TV Market Ranking: 43 (Ahwatukee, Apache Country Club, Apache Wells, Chandler, East Mesa, Fountain Hills, Glendale, Golden Hills, Goodyear, Guadalupe, Leisure World, Litchfield Park, portions of Maricopa County, Mesa, Paradise Valley, Peoria, Phoenix, Sun City, Sun City West, Sun Lakes, Surprise, Tempe, Youngtown); Outside TV Markets (Buckeye, portions of Maricopa County). Franchise award date: N.A. Franchise expiration date: N.A. Began: January 1, 1960.

Channel capacity: 43 (2-way capable; operating 2-way). Channels available but not in use: None.

Basic Service

Subscribers: 416,650 (05/31/95).
Programming (received off-air): KAET (P), KNXV-TV (A), KPAZ-TV (T), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I), KTVW-TV (S), KUTP (U) Phoenix; allband FM.
Planned programming (via microwave): KTTV (F) Los Angeles.
Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; A & E; American Movie Classics; Arizona Sports Programming Network; C-SPAN; C-SPAN 2; CNBC; CNN; Cartoon Network; Comedy Central; Court TV; Discovery Channel; E! Entertainment TV; ESPN; EWTN; Family Channel; Gems Television; Headline News; Lifetime; ME/ Knowledge TV; MTV; Nashville Network; Nickelodeon; Odyssey; Prime Sports West; QVC; Sci-Fi Channel; Tele-mundo; The Weather Channel; Travel Channel; USA Network; VH1.
Current origination: Time-weather; news-ticker; public access; educational access; government access.
Fee: \$65.00 installation; \$10.95 monthly; \$9.95 additional installation.

Pay Service 1

Pay Units: 202,200 (06/01/91).
Programming (via satellite): Cinemax; Disney Channel; HBO; Showtime; The Movie Channel.
Fee: \$7.72 monthly (Cinemax or Disney), \$8.95 monthly (Showtime or TMC), \$10.95 monthly (HBO).

Pay-Per-View

Addressable homes: 144,353 (01/01/93).
Viewer's Choice.
Fee: \$4.95.

Interactive Services

Burglar alarm; fire alarm.
Program Guide: TV Times.
Equipment: Ameco headend; Ameco amplifiers; Jerrold & Tocom addressable set top converters; Scientific-Atlanta satellite antenna; Scientific-Atlanta satellite receivers.
Miles of plant: 6725.0 (coaxial). Homes passed: 724,600.
Manager: Gregg Holmes. Chief technician: Alan Sparks. Program director: Joan Reischman. Marketing director: Paul Gregg.
Ownership: Cox Communications Inc. (MSO).

PHOENIX (northwestern portion)—Insight Communications, 21200 N. Black Canyon Hwy., Phoenix, AZ 85027. Phone: 602-582-8282. Fax: 602-582-9649. County: Maricopa. ICA: AZ0011.

TV Market Ranking: 43. Franchise award date: N.A. Franchise expiration date: November 1, 1995. Began: January 1, 1981.
Channel capacity: 54 (not 2-way capable). Channels available but not in use: 3.

Basic Service

Subscribers: 10,619 (02/03/96).
Programming (received off-air): KAET (P), KNXV-TV (A), KPAZ-TV (T), KPHO-TV

(C), KPNX (N), KSAZ-TV (F), KTVK (I), KTVW-TV (S), KUTP (U) Phoenix.
Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; WWOV-TV (U) New York; A & E; American Movie Classics; C-SPAN; CNBC; CNN; Comedy Central; Discovery Channel; E! Entertainment TV; ESPN; Family Channel; Headline News; Home Shopping Network; Lifetime; MTV; Nashville Network; Nickelodeon; Odyssey; QVC; The Weather Channel; Turner Network TV; USA Network; VH1.
Current origination: Time-weather; channel guide; bulletin board; classified ads; public access; government access; emergency alert; public service announcements.
Planned origination: Educational access.
Fee: \$39.95 installation; \$24.25 monthly.

Pay Service 1

Pay Units: 792 (06/01/93).
Programming (via satellite): Cinemax.
Fee: \$10.00 installation; \$9.95 monthly.

Pay Service 2

Pay Units: 1,286 (06/01/93).
Programming (via satellite): Disney Channel.
Fee: \$10.00 installation; \$9.95 monthly.

Pay Service 3

Pay Units: 2,150 (06/01/93).
Programming (via satellite): HBO.
Fee: \$10.00 installation; \$9.95 monthly.

Pay Service 4

Pay Units: 2,138 (06/01/93).
Programming (via satellite): Showtime.
Fee: \$10.00 installation; \$9.95 monthly.

Pay Service 5

Pay Units: 1,429 (06/01/93).
Programming (via satellite): The Movie Channel.
Fee: \$10.00 installation; \$9.95 monthly.

Pay-Per-View

Addressable homes: 6,071 (02/03/96).
Viewer's Choice.
Fee: \$4.95.

Local advertising: Planned.

Equipment: Phasecom & Scientific-Atlanta headend; Texscan amplifiers; Comm/Scope cable; Hitachi cameras; NEC VTRs; Video Data Systems character generator; Scientific-Atlanta set top converters; Scientific-Atlanta addressable set top converters; Hughes & Scientific-Atlanta satellite antenna; Hughes & Scientific-Atlanta satellite receivers.

Miles of plant: 374.0 (coaxial). Additional miles planned: 5.0 (coaxial). Homes passed: 15,000. Total homes in franchised area: 30,000.

Manager: David Services. Chief technician: Doug Brown. Marketing director: Cindy Largay.
City fee: 5% of gross.
Ownership: Insight Communications Co. (MSO).

PHOENIX (western portion)—See LUKE AFB, AZ.

PIMA—See SAFFORD, AZ.

PIMA COUNTY—Jones Intercable, 8251 N. Cortaro Rd., Tucson, AZ 85743-9599. Phone: 520-744-2653. Fax: 520-744-4737. Counties: Pima & Pinal. Also serves Avra Valley, Catalina, Marana, Oro Valley. ICA: AZ0003.

TV Market Ranking: Below 100 (Avra Valley, Catalina, Marana, Oro Valley, portions of Pima County); Outside TV Markets (portions of Pima County). Franchise award date: August 1, 1979. Franchise expiration date: July 1, 1997. Began: July 1, 1982.
Channel capacity: 54. Channels available but not in use: None.

Limited Basic Service

Subscribers: 3,100 (06/30/93).
Programming (received off-air): KGUN (A), KMSR-TV (F), KOLD-TV (C), KTTU-TV (U), KUAT-TV (P), KVQA (N) Tucson; 6 fms.
Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; WWOV-TV (U) New York.
Current origination: Time-weather; stock ticker; channel guide; bulletin board; classified ads; educational access; government access; emergency alert; program guide; Pima College courses.
Fee: \$14.50 installation; \$4.80 monthly.

Basic Service

Subscribers: 52,703; Commercial subscribers: 39 (12/05/95).
Programming (via satellite): A & E; American Movie Classics; Bravo; C-SPAN; C-SPAN 2; CNBC; CNN; Comedy Central; Country Music TV; Discovery Channel; Disney Channel; ESPN; Electronic Program Guide; Family Channel; Headline News; Home Shopping Network; Home Shopping Network 2; Lifetime; ME/ Knowledge TV; MTV; Nashville Network; Nickelodeon; Odyssey; Prime; Tele-mundo; The Weather Channel; Turner Classic Movies; Turner Network TV; USA Network; Univision; VH1.
Fee: \$23.20 installation; \$29.50 monthly; \$10.00 additional installation.

Pay Service 1

Pay Units: 5,080 (12/01/93).
Programming (via satellite): Cinemax.
Fee: \$8.80 monthly.

Pay Service 2

Pay Units: 9,179 (12/01/93).
Programming (via satellite): HBO.
Fee: \$8.80 monthly.

Pay Service 3

Pay Units: 3,826 (12/01/93).
Programming (via satellite): The Movie Channel.
Fee: \$8.80 monthly.

Pay Service 4

Pay Units: 5,785 (12/01/93).
Programming (via satellite): Showtime.
Fee: \$8.80 monthly.

Pay Service 5

Pay Units: N.A.
Programming (via satellite): Encore.
Fee: \$2.00-\$6.95 monthly.

Pay-Per-View

Addressable homes: 33,000 (04/01/93).
Request TV; Spice; Viewer's Choice.
Local advertising: Yes. Rates: \$50.00/Month.
Equipment: Scientific-Atlanta headend; Scientific-Atlanta & Texscan amplifiers; Times Fiber & Comm/Scope cable; Tocom addressable set top converters; Scientific-Atlanta satellite antenna; Scientific-Atlanta satellite receivers.
Miles of plant: 1450.0 (coaxial). Additional miles planned: 65.0 (coaxial). Homes passed: 69,000.
Manager: Jeff Spieglerman. Chief technician: Allen Showalter. Marketing director: Kenna Smith.
County fee: 3% of gross.
Ownership: Jones Intercable Inc. (MSO).

PIMA COUNTY—See also TUCSON, AZ.

PINAL COUNTY—See CASA GRANDE, AZ.

PINAL COUNTY (portions)—See APACHE JUNCTION, AZ.

PINAL COUNTY (portions)—See KEARNY, AZ.

Exhibit 4



Phoenix Market Overview

DMA Rank: 17

Revenue Rank: 13

Demographic and Economic Overview (000s, except Retail Sales and EBI in \$000,000s)

	1989	1994	Growth Rate	1994	1999	Growth Rate
DMA Population	2,722	3,094	2.6%	3,094	3,543	2.7%
Households	1,052	1,160	2.0%	1,160	1,351	3.1%
Retail Sales	18,833	27,996	8.3%	27,996	39,572	7.2%
EBI	33,902	47,120	6.8%	47,120	63,376	6.1%

Pop Rank # 18	DMA Counties	10	White	89.5%	Avg Household	\$40,621
HH Rank # 18	TV Households	1,170	Black	3.3%	Per Capita	\$15,229
RS Rank # 18	DMA Cable	57%	Asian	1.8%	Spanish Speaking	17.4%
EBI Rank # 23	DMA VCR	82%				

Market Television Financials (all figures in 000s, except percentages)

	1989	1990	1991	1992	1993	1994	Δ 89-94
ESTIMATED GROSS REVENUES *	\$ 161,800	157,000	169,200	186,100	214,000	256,000	9.6%
	Δ 94-95	1995	1996	1997	1998	1999	Δ 95-99
	7.0%	\$ 274,000	294,100	306,400	329,000	347,700	6.1%

Estimated Breakouts	% Network	% Natl/Real	% Local
	2.5%	52.5%	45.0%

	1989	1994	1999
Revenue/Retail Sales	\$ 8.59/1,000	\$ 9.14/1,000	\$ 8.79/1,000
Revenue/Capita	\$ 59.44	\$ 82.74	\$ 98.14

Phoenix Competitive Overview

Cells	City of License	Ch	Visual Power (kW)	NAAT	LMA	Aff	Rep	Owner	Year Std	Date Acq	Sales Price (000)	Est '95 Revenue (000)	Est Power Ratio	Avg 95 LCS	SHARE SUMMARY 9:00 AM - MIDNIGHT								
															May 96	Feb 96	Nov 95	Jul 95	May 95	Feb 95	Nov 94	Jul 94	
KNAZ-TV	Flagstaff	2	100	1,601		NBC	Katz	Grand Canyon TV Co	70	9205		g											
KTVK	Phoenix	3	100	1,778	1	IND	TelRp	Media America Corp	55	7706	5,907	51,100	1.03	18	11	11	11	12	12	12	16	16	
KZJC	Flagstaff	4	100 cp	377				Spain, Frank & Family NOA															
KPHO-TV	Phoenix	5	100	1,772		CBS	MMT	Meredith Corp	49	5206		36,500	0.78	17	10	11	10	11	12	13	13	9	
KMOH-TV	Kingman	6	100	1,919		IND		Grand Canyon TV Co	88	9205		g											
KUSK	Prescott	7	9	2,809		IND		KUSK Inc	82														
KSAZ-TV	Phoenix	10	316	1,828		FOX		New World Comm Group	53	9409		g	38,200	1.08	13	8	9	10	9	9	10	9	16
KPNX	Mesa	12	316	1,782		NBC	Blair	Gannett Co	53	7906		55,700	0.93	22	18	16	15	13	19	16	15	13	
* KWBZ	Flagstaff	13	290	1,555		WB		Paxon Comm Corp	92	9605		gp											
KHXV-TV	Phoenix	15	537	1,709		ABC	Katz	Scripps Howard Bcatg	79	8501	26,600	37,700	0.94	15	10	11	12	9	11	11	11	10	
KPAZ-TV	Phoenix	21	1,290	1,604		REL		Trinity Bcatg Ntwk	67	7707													
KTVW-TV	Phoenix	33	2,290	1,709		UNI	UNI	Univision TV Group	79	9212		g	9,600	0.83	4	3	3	3	3	3	3	3	
KUTP	Phoenix	45	2,750	1,788		UPN		United Television	85			38,000	1.21	12	6	8	8	8	8	9	8	6	
KAJW	Tolleson	51	5,000 cp	1,755				Salvatierra, H.G.	NOA														
KASW	Phoenix	61	2,500 cp	1,775	1	WB		Brooks Bcatg	95						4	4	3						

*KAET	Phoenix	8	316	1,755		PBS		AZ State University	61						5	5	4	5	4	4	4	5	
															Total								
															75%	78%	76%	70%	78%	78%	79%	78%	
															HUT %								
															41%	41%	42%	41%	43%	43%	44%	42%	

Other allocations: Ch 9, Flagstaff

* Indicates a change since last edition.

1/ See Introduction section for interpretation of revenue estimates.

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DMA Rank: 17

Payment Transactions Detail Report

Date: 2/2/98

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9709228835549003	KPNX BROADCASTING COMPANY		09/18/97
	1101 NORTH CENTRAL AVENUE		
	PHOENIX	AZ	85004

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$28,850.00	\$28,850.00	17	MUB7	1	KC26141	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	1	MBV7	1	KNAZTV	MULTIMEDIA INC	860046106		\$28,450.00	1	PMT
\$28,850.00	\$28,850.00	3	MUB7	1	WDF40	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	4	MUB7	1	WDF41	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	5	MUB7	1	WLI409	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	6	MUB7	1	WLI410	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	7	MUB7	1	WLI411	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	8	MUB7	1	WLI412	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	9	MUB7	1	WLI413	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	10	MUB7	1	WLI415	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	11	MUB7	1	WLI416	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	12	MUB7	1	WLI417	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	13	MUB7	1	WLI418	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	14	MUB7	1	WLI419	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	15	MUB7	1	WMU809	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	16	MUB7	1	WMU810	MULTIMEDIA INC	860046106		\$25.00	1	PMT
\$28,850.00	\$28,850.00	2	MUB7	1	WMV291	MULTIMEDIA INC	860046106		\$25.00	1	PMT
Total	17								\$28,850.00		

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

PETER D. O'CONNELL
OF COUNSEL
(202) 429-3350

FACSIMILE
(202) 429-7049

September 10, 1998

VIA FACSIMILE

Thomas Putnam, Esq.
Fee Section
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: Station KNAZ-TV, Flagstaff, AZ
Petition for Reduction of 1997 Regulatory Fee

Dear Mr. Putnam:

In line with our conversation this morning, and your discussion yesterday with Melissa Stoll of this office, I wish to confirm our representation of the above-referenced station, licensed to Multimedia, Inc., a subsidiary of Gannett Co., Inc.

Along with Melissa and others, I moved to this firm on January 1, 1998, at which time the representation of Gannett and its TV stations was shifted from Reed Smith Shaw & McClay to Wiley, Rein & Fielding. Accordingly, future communications relating to KNAZ-TV should be sent to me at the above address.

Thank you for your assistance in our discussion today.

Sincerely,

WILEY, REIN & FIELDING



Peter D. O'Connell

PDO:sa

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

September 29, 1998

OFFICE OF
MANAGING DIRECTOR

DOCKET FILE COPY ORIGINAL

Ms. Dixie Halverson
Manager
Prairie Communications, Inc.
P.O. Box 220
Scobey, MT 59263

Re: Request for Waiver of Regulatory Fee and
Late Payment Penalty

Dear Ms. Halverson:

This is in response to your request for waiver of the Fiscal Year 1997 regulatory fee and late payment penalty for Radio Station KCGM-FM, Scobey, Montana, licensed to Prairie Communications, Inc. You assert that payment of the regulatory fee and penalty would be a financial hardship, and in support of your waiver request you submitted Prairie Communications' 1996 and 1997 income tax returns.

The waiver request is untimely. On August 1, 1997, the Commission issued a Public Notice, FY 1997 Mass Media Regulatory Fees, to all licensees, advising them of their Fiscal Year 1997 regulatory fee obligations. Licensees were notified that fee payments were to be received by the Commission by September 19, 1997 and they were advised of their right to request deferment of the fees by September 19, 1997. The Commission in establishing the regulatory fee program said that it would "accept petitions for waiver, reduction and deferments [of the regulatory fees] so long as they are filed no later than the date payment is due." Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5345 ¶ 34 (1994). On April 21, 1998, Prairie Communications was advised by letter that the Commission had no record for the payment of its FY 1997 regulatory fee for KCGM and that the licensee was to either submit payment or proof of payment. There is no record of a response to the April 21, 1998 letter. It was only after the Commission advised you in a further letter dated June 12, 1998 that payment of the fee and penalty were due, that you filed your request for waiver of the regulatory fee and penalty.

A review of the Commission's records indicates that you have made no attempt to show why you could not have filed a waiver request in a timely manner. Your failure to comply with the Commission's

Ms. Dixie Halverson

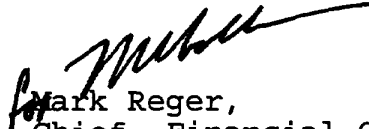
2.

filing rules, has added to the Commission's regulatory burden and you have not made a compelling showing of why the Commission should grant your untimely request for waiver of the fee and late payment penalty. Thus, your untimely waiver request is denied.

Payment of the FY 1997 regulatory fee in the amount of \$200 and the late payment penalty of \$50 for Radio Station KCGM is now due. The aggregate \$250 fee and penalty should be filed together with a Form FCC 159 (copy enclosed) within 15 days from the date of this letter. You are cautioned, that the failure to submit payment as required, may result in further sanctions and the initiating of a proceeding to recover the fees and penalty pursuant to the provisions of the Debt Collection Act.

If you have any questions concerning payment of the fee and penalty, please call the Chief, Fee Section at (202) 418-1995.

Sincerely,


Mark Reger,
Chief, Financial Officer

Enclosure

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

November 18, 1996

OFFICE OF
MANAGING DIRECTOR

Ms. Dixie Halverson
Manager
Prairie Communications, Inc.
P.O. Box 220
Scobey, MT 59263

Re: Request for Waiver of Regulatory Fee

Dear Ms. Halverson:

This is in response to your request, filed on behalf of Prairie Communications, Inc. (Prairie), for waiver of the Fiscal Year 1996 (FY 1996) regulatory fees for Radio Station KCGM-FM, Scobey, Montana. In support, you have submitted a copy of our letter of December 1, 1995, granting a waiver of the FY 1994 regulatory fees and Prairie's Income Tax Returns for the years 1994 and 1995.

In implementing the fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." See Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994).

We previously determined that Prairie's Income Statements and Tax Returns demonstrated that it had suffered monetary losses for each year from 1983 through 1992, and that, although Prairie reported a profit in 1993, it was not large enough to cover its regulatory fee. Prairie's 1994 and 1995 Tax Returns show additional losses and that no salaries or other payouts were received by the officers of the licensee. Thus, Prairie has presented a compelling case of financial hardship, and the request for a waiver of the FY 1996 regulatory fee requirement is granted.

The waiver, however, is limited to the FY 1996 regulatory fee. If KCGM-FM continues to experience financial hardship, you may file requests for waivers of the regulatory fees for FY 1997 and succeeding years, supported by documentation of KCGM-FM's financial condition.

Ms. Dixie Halverson
Page 2

If you have any questions concerning the regulatory fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

Marilyn J. McDermett

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

December 1, 1995

OFFICE OF
MANAGING DIRECTOR

Ms. Dixie Halverson
Manager
KCGM FM Stereo
P.O. Box 220
20 Main Street
Scobey, MT 59623

Re: Request for Waiver of Regulatory Fee
Fee Control # 9409068835303011
Fee Paid: \$900

Dear Ms. Halverson:

This is in response to your request, filed on behalf of Prairie Communications, Inc. (Prairie), for waiver and refund of the Fiscal Year 1994 (FY 1994) regulatory fees for Radio Station KCGM-FM, Scobey, Montana. You maintain that the station serves a rural, agricultural community, that Prairie has not made a profit since it obtained its license for KCGM-FM, and that you have kept the station on the air "by not funding depreciation accounts and other extremes that are not good business practices!" In support of Prairie's request, you submitted Prairie's Income Statements and Tax Returns for the years 1984 through 1993.

In implementing the fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." See Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994).

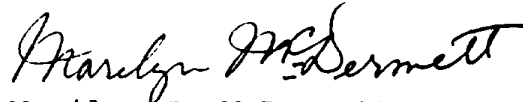
Prairie's Income Statement and Tax Returns establish that it reported monetary losses for each year from 1983 through 1992. Although Prairie reported a profit in 1993, it was only \$124, and not large enough to cover the \$900 regulatory fee. Moreover, we note that, over the course of this period, Prairie's accumulated net operating loss totals \$127,145. Thus, Prairie has presented a compelling case of financial hardship and the request for a waiver of the FY 1994 regulatory fee requirement for KCGM-FM is granted.

Ms. Dixie Halverson
Page 2

The waiver, however, is limited to the FY 1994 regulatory fee. If KCGM-FM continues to experience financial hardship, you may file requests for waivers of the regulatory fees for FY 1995 and succeeding years, supported by documentation of KCGM-FM's financial condition.

A check, payable in the amount of \$900, and drawn payable to the maker of the original check, will be sent you at the earliest practicable time. If you have any questions concerning the regulatory fees, please call the Chief, Fee Section at (202) 418-1995.

Sincerely,



Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

JUN 12 1998

OFFICE OF
MANAGING DIRECTOR

PRAIRIE COMMUNICATIONS, INC.
KCGM-FM
20 MAIN ST. P.O. BOX 220
Scobey, MT 59263

REF: KCGM-FM

Dear Gentlemen:

This is the second demand for payment. If payment is not made within 30 days of this letter, or in the alternative, proof of payment or documentation establishing that you are exempt from the regulatory fee requirement, any pending actions for this station will be dismissed, and any subsequent requests for Commission action may be subject to denial.

Payment of the \$200 1997 regulatory fee, and the 25% late payment penalty assessed under 47 C.F.R. § 1.1164, are now due. Payment in full of \$250 should be remitted with the enclosed Form 159 to the Federal Communications Commission, P.O. Box 358835, Pittsburgh, PA 15251-5835, pursuant to instructions on the Form 159. You should also review your records to ensure that payments are made for any auxiliary stations associated with the reference call sign, for any other calls signs assigned to you, or for any prior fiscal years for which payments are due.

You are advised that failure to pay the regulatory fees and penalties as described above may result in the imposition of further sanctions under 47 C.F.R. § 1.1164. If you have any questions concerning the fees, you may contact me at (202) 418-1995.

Sincerely,



Regina W. Dorsey, Chief
Billings & Collections Branch

Enclosure

"VOICE OF THE PRAIRIES . . . your good neighbor station"
95.7 on the FM dial — 103.9 in the Glasgow area — 102.3 in the Poplar & Wolf Point area

KCGM FM Stereo

P.O. Box 220
SCOBEY, MONTANA 59263

Owned and Operated by Prairie Communications, Inc.

Ph. 406-487-2293

52,000W Horizontal
52,000W Vertical

JUN 22 1998

Rec'd

BCB

7/19/98

000000BCB-98-056

Jerry

June 18, 1998

Federal Communications Commission
PO Box 358835
Pittsburgh, PA 15251-5835

RE: Request for Waiver of 1997 Regulatory Fee
Fee Control #9409068835303011

Dear Sir:

This letter is to be used as a request for a waiver of Regulatory Fees for 1997 based on financial hardship. Please refer to Implementation of Section 9 of the Communications Act, 9 FCC Red 5333, 5346.

I am enclosing copies of our 1996 and 1997 income taxes, as well as a copy of your response to our previous request for relief in this request.

I await your response.

Sincerely,

Dixie Halverson

Dixie Halverson
Manager

DH:jmm
enclosure

"THE BEST MUSIC IN THE COUNTRY"

My apologies for not attending to this in a timely manner.

My only excuse is that I have taken another job to try to make ends meet financially.

I only wish that I could enclose a check for the \$250.⁰⁰ with the hope that it could be returned if we are granted the waiver. However I do not have the money at this time.

Sincerely

Negie Halverson

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

September 15, 1998

OFFICE OF
MANAGING DIRECTOR

Ms. Becky Staggs
Business Manager
R & S Radio Marketing
1529 Miracle Mile Road
Springfield, OH 45503

DOCKET FILE COPY ORIGINAL

Re: Request for Waivers of Regulatory Fees
Radio Stations WBLY and WIZE

Dear Ms. Staggs:

This is in response to your request for waivers of the Fiscal Year (FY) 1997 regulatory fees for AM Radio Stations WBLY and WIZE, Springfield, Ohio, licensed to R & S Radio Marketing (R & S). In response to our letter of February 9, 1998, R & S submitted a list of salaries paid to officers and other employees, a balance sheet, and an income statement. You indicate that no deductions were made for depreciation or amortization.

In establishing the regulatory fee program, the Commission recognized that in certain instances licensees would be unable to pay their regulatory fees without impairing the quality of their service to the public. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." See Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995).

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon an applicant's cash flow, as opposed to the entity's profits. In this regard, it is noted that our finding of financial hardship goes only to whether there are sufficient funds to maintain the station and not whether the station is able to provide sufficient income to its principals. Thus, deductions for amortization and depreciation and payments to principals, which reduce gross income for tax purposes, represent money which is ordinarily available to pay the regulatory fees.

R & S Income Statement indicates that for FY 1997 it had an income loss of \$4,981. However, the loss is exceeded by the payments to principals in excess of \$13,000. These payments are considered to be money available to pay the regulatory fees without impacting on other funds used to run the station. Thus, although R & S may be only marginally, financially viable, it has not established a compelling case of economic hardship.


Ms. Becky Staggs

2.

Your request for waivers of the regulatory fees is dismissed. WBLY's FY 1997 regulatory fees of \$1,400, and WIZE's FY 1997 regulatory fee of \$1,200 are now due. Payment of the aggregate \$2,600 in regulatory fees, should be submitted to the Commission together with a completed FCC Form 159 (copy enclosed) within 30 days from the date of this letter.

If you have any questions concerning the regulatory fee payment, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,


Mark Reger
Chief Financial Officer

Enclosures

Jerry

000000BLB-98-031.

R&S Radio Marketing
1529 Miracle Mile Rd.
Springfield, OH 45503

3-98
3-5-98
FEB
BIB

March 3, 1998

Federal Communications Commission
Attn: Thomas M. Holleran, Acting Associate Managing Director for Operations
Washington, D.C. 20554

Dear Mr. Holleran,

On behalf of Mr. Staggs and Mr. Yontz, I ask that you eliminate or reduce the regulatory fees to more closely match the size of WBLY-AM and WIZE-AM's station and market and their ability to pay. I am their outside accountant and am owed \$1,500 for 1996 tax work and \$3,000 for 1997 tax work. At year end they had \$1,503.53 and \$2,172.27 in their corporate checking accounts. They have recorded current liabilities of \$12,410.68 and unbooked current liabilities in excess of \$8,000. I am attaching your letter with the information that you requested. I hope you can assist some struggling broadcasters in their attempt to meet the needs of the public. Thank you for your consideration.

Sincerely,

Scot L. Freeman

Scot L. Freeman
Accountant

cc Jerry & Becky Staggs
Ron Yontz

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

February 9, 1998

OFFICE OF
MANAGING DIRECTOR

Ms. Becky Staggs
Business Manager
R & S Radio Marketing
1529 Miracle Mile Road
Springfield, OH 45503

Re: Request for Waiver of Regulatory Fees
Radio Stations WBLY and WIZE

Dear Ms. Staggs:

This is in response to your request for waivers of the Fiscal Year (FY) 1997 regulatory fee for AM Radio Stations WBLY and WIZE, Springfield, Ohio. You argue that the stations are unable to pay the regulatory fees.

In establishing the regulatory fee program, the Commission recognized that in certain instances licensees would be unable to pay their regulatory fees without impairing the quality of their service to the public. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." See Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995).

The Commission further held that regulatees can establish financial need by submitting:

[I]nformation such as a balance sheet and profit and loss statement (audited, if available), a cash flow projection . . . (with an explanation of how calculated), a list of their officers and their individual compensation, together with a list of their highest paid employees, other than officers, and the amount of their compensation, or similar information.

10 FCC Rcd at 12761-762, ¶¶ 12-13.

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon an applicant's cash flow, as opposed to the entity's profits. Thus, deductions for amortization and depreciation and payments to principals, which reduce gross income for tax purposes, represent money which is ordinarily available to pay the regulatory fees.

officers

Ron Yentz
\$8,800

Gerald Staggs \$1,500

Becky Staggs \$2,962

Highest Paid
Employees

Marty Bannister
Sports & News
\$20,800

Matt Yentz sales \$24,001

Note Letter NOT Received until 3-2-98

Attach (1)

Attach (2) No audit

can't afford to do

officers

~~Higher Paid Employees~~

Ms. Staggs


2

In the absence of the required documentation of financial hardship you have failed to establish a compelling case of financial hardship for either radio station. Therefore your request for waivers of the regulatory fees is dismissed. WBLY's FY 1997 regulatory fee of \$1,400, and WIZE's FY 1997 regulatory fee of \$1,200 are now due.

Payment of the \$1,400 fee for AM Radio Station WBLY, and \$1,200 fee for AM Radio Station WIZE should be submitted with completed FCC Forms 159 (copies enclosed). However, in view of your allegation that payment of the regulatory fees could create financial hardships for Radio Stations WBLY and WIZE, in lieu of paying the fees, you may file a further request for deferments and waivers supported by appropriate documentation, within 30 days from the date of this letter.

If you have any questions concerning the regulatory fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,


Thomas M. Holleran
Acting Associate Managing
Director for Operations

Enclosures

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

September 15, 1998

OFFICE OF
MANAGING DIRECTOR

DOCKET FILE COPY ORIGINAL

Mark N. Lipp, Esquire
Ginsburg, Feldman & Bress Chartered
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036-2600

Re: Request for Waiver of Regulatory Fee
Radio Station WMYQ (AM)
Fee Control # 9709228835178004
Fee Paid: \$1,000

Dear Mr. Lipp:

This is in response to your request for a waiver of the Fiscal Year (FY) 1997 regulatory fee for AM Radio Station WMYQ (AM), Newton, Mississippi, licensed to Rainey Radio, Inc. You argue that WMYQ was dark and not operating. The Commission granted Rainey Radio's request for a waiver of the FY 1996 fee. The Commission's records, however, indicate that WMYQ's last authority to remain dark, expired on June 21, 1995.

In Implementation of Section 9 of the Communications Act, FCC 95-257, ¶ 15, released June 22, 1995, the Commission determined that the imposition of a regulatory fee could be an impediment to the restoration of service by dark stations and that it would therefore, waive the fee requirement for stations which have ceased operation. However, the Commission will only waive the regulatory fees for those stations which are dark pursuant to authority from the Commission. If WMYQ is dark, it apparently has ceased operation without Commission authority.

Accordingly, the petition for waiver of the regulatory fee is denied. If you have any questions concerning the fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,


for Mark Reger
Chief Financial Officer

9109228835178004

LAW OFFICES
GINSBURG, FELDMAN AND BRESS
CHARTERED
1250 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036-2600
TELEPHONE (202) 637-9000
FAX (202) 637-9195

ORIGINAL

8201 GREENSBORO DRIVE
MCLEAN, VA 22102
TELEPHONE (703) 821-3610
FAX (703) 821-7990

CORRESPONDENT OFFICE
9, RUE BOISSY D'ANGLES
75008 PARIS, FRANCE

MARK N. LIPP
(202) 637-9086
mlipp@gfbllaw.com

RECEIVED

SEP 18 1997

September 18, 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554
ATTN: Managing Director

Re: 1997 Regulatory Fees
Station WMYQ(AM)
Newton, Mississippi
Rainey Radio, Inc.

Dear Mr. Caton:

Rainey Radio, Inc., is the licensee of Station WMYQ(AM), Newton, Mississippi. Station WMYQ(AM) has been dark pursuant to Special Temporary Authority granted by the Commission. Therefore, Rainey Radio, Inc., requests a waiver of the regulatory fee for FY 1997. See Section 1.1166 of the Commission's Rules. Please note that WMYQ(AM) was granted a waiver of regulatory fees for FY 1996 on August 29, 1997 for this same reason (please see attached letter).

Should any questions arise in connection with this matter, please contact the undersigned.

Sincerely,

Mark N. Lipp
Mark N. Lipp
Counsel for Rainey Radio, Inc.

cc: Ms. Marilyn J. McDermott—Office of Managing Director

PH026.009

::ODMA\PCDOCS\GFBDOS\28721\1

RECEIVED

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

SEP 18 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 29, 1997

OFFICE OF
MANAGING DIRECTOR

Mark N. Lipp, Esquire
Mullin, Rhyne, Emmons and Topel
1225 Connecticut Avenue, N.W.
Suite 300
Washington, D.C. 20036-2604

Re: Request for Waiver of Regulatory Fees
Rainey Radio, Inc.
Radio Station WMYQ-AM

Dear Mr. Lipp:

This is in response to your request for waiver of the Fiscal Year 1996 (FY 1996) regulatory fee for Rainey Radio, Inc., licensee of Radio Station WMYQ-AM, Newton, Mississippi.

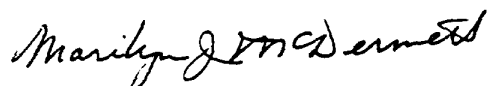
Please excuse our delay in responding to your request.

You request a waiver of the regulatory fee because WMYQ-AM did not operate during 1996, pursuant to grants of temporary authority by the Commission. In Implementation of Section 9 of the Communications Act, 10 FCC Rcd 12759, 12762 ¶ 15 (1995), the Commission, noting that dark stations generate little or no revenues and that imposition of a regulatory fee could be an impediment to the restoration of service, held that it would waive the regulatory fee for stations which have temporarily ceased operation.

Accordingly, your request is granted, and the FY 1996 regulatory fee for Rainey Radio, Inc., as licensee of Radio Station WMYQ-AM, is waived.

If you have any questions concerning the waiver, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,



Marilyn J. McDermett
Associate Managing Director
for Operations

Payment Transactions Detail Report

Date: 12/2/97

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date								
9709228835178004	RAINEY RADIO INC 100 22ND AVE SOUTH SUITE F MERIDIAN MS 39301		09/17/97								
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$1,000.00	\$1,000.00	1	MGF7	1	WMYQFM	RAINEY RADIO INC	39301		\$1,000.00	1	PMT
Total									\$1,000.00		